

# Milbank

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June 19, 2020

**VIA ECF**

Hon. Lewis J. Liman  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Financial Guaranty Insurance Company v. The Putnam Advisory Company, LLC*,  
No. 12-cv-7372 (S.D.N.Y.)

Dear Judge Liman:

This firm represents Defendant The Putnam Advisory Company, LLC (“Putnam”) in the above-captioned action. Pursuant to Rule 5.A(x) of Your Honor’s Individual Practices in Civil Cases, Putnam hereby provides designations of deposition testimony that Putnam will offer in its case-in-chief, as well as counter-designations and objections. For ease of review, Putnam is providing designations in two formats: (1) in list form, which indicate Putnam’s affirmative designations, Plaintiff Financial Guaranty Insurance Company’s (“FGIC”) counter-designations, and each party’s objections; and (2) highlighted transcripts, which indicate Putnam’s affirmative designations in red highlighting and FGIC’s counter-designations in green highlighting.

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Hon. Lewis J. Liman  
June 19, 2020

Page 2

Additionally, pursuant to Rule 5.C(ii) of Your Honor's Individual Practices in Civil Cases, Putnam hereby provides synopses of deposition testimony that Putnam will offer as substantive evidence at trial.

Respectfully submitted,

/s/ Sean Murphy  
Sean Murphy

cc: All Counsel of Record (*via* ECF)